

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**KAREN WHITE,**

**Plaintiff,**

**v.**

**CIVIL ACTION NO. 3:12cv00115**

**BMW OF NORTH AMERICA, LLC.,**

**Defendant**

**PLAINTIFF'S MEMORANDUM IN SUPPORT OF MOTION FOR ENLARGEMENT OF  
TIME IN WHICH TO DESIGNATE AN EXHIBIT**

COMES NOW, the Plaintiff, KAREN WHITE, by counsel, in support of her Motion for Enlargement of time in which to designate an exhibit and states as follows:

On August 31, 2012, Plaintiff identified her exhibits that she intends to use at the trial of this matter. Pursuant to the Court's Pretrial Order, August 31, 2012 was the deadline in which Plaintiff was to designate her exhibits. However, Plaintiff just today has been advised by a technician of Casey BMW that the engine that BMW replaced in her automobile must again be torn down and repaired.

Plaintiff identified repair records of Defendant within her list of exhibits, however, Plaintiff now requests that she be allowed to supplement the list of exhibits to include any additional repairs and/or estimates of repair for which she has recently sought and for which the automobile is presently undergoing. Defendant will not be prejudiced by this late designation.

Plaintiff therefore requests the Court's entry of the proposed Order attached to her Motion.

Respectfully submitted,  
**KAREN WHITE,**

/s/

Leonard A. Bennett, Esq., VSB #37523  
Attorney for Plaintiff  
CONSUMER LITIGATION ASSOCIATES, P.C.  
763 J. Clyde Morris Boulevard, Suite 1-A  
Newport News, Virginia 23601  
(757) 930-3660 - Telephone  
(757) 930-3662 – Facsimile  
E-mail: [lenbennett@cox.net](mailto:lenbennett@cox.net)

Susan Rotkis, Esq. VSB #40639  
CONSUMER LITIGATION ASSOCIATES, P.C.  
763 J. Clyde Morris Boulevard, Suite 1-A  
Newport News, Virginia 23601  
(757) 930-3660 - Telephone  
(757) 930-3662 – Facsimile  
E-mail: [srotkis@clalegal.com](mailto:srotkis@clalegal.com)

*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 12<sup>th</sup> day of September, 2012, I will file the foregoing motion electronically using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Anne Steel Burris  
Lindabury McCormick Estabrook & Cooper  
53 Cardinal Drive  
PO Box 2369  
Westfield, NJ 07091  
(908) 301-5641  
Fax: (908) 233-5078  
Email: [aburris@lindabury.com](mailto:aburris@lindabury.com)

Christopher James Dalton  
Buchanan Ingersoll & Rooney PC (NA-NJ)  
550 Broad Street  
Suite 810  
Newark, NJ 07102 (973) 424-5614  
Fax: (973) 273-9430  
Email: [christopher.dalton@bipc.com](mailto:christopher.dalton@bipc.com)

Rachel Jane Elsby  
Buchanan Ingersoll & Rooney PC (VA)  
1737 King St  
Suite 500  
Alexandria, VA 22314-2727  
703-836-6620  
Fax: 703-836-2021  
Email: [Rachel.Elsby@bipc.com](mailto:Rachel.Elsby@bipc.com)

Rosemary Joan Bruno  
Buchanan Ingersoll & Rooney PC (NA-NJ)  
550 Broad Street  
Suite 810  
Newark, NJ 07102  
(973) 424-5600  
Fax: (973) 273-9430  
Email: [rosemary.bruno@bipc.com](mailto:rosemary.bruno@bipc.com)

James Domenic DeRose  
Lindabury McCormick Estabrook & Cooper  
53 Cardinal Drive  
PO Box 2369  
Westfield, NJ 07091  
(908) 301-5611  
Fax: (908) 233-5078  
Email: [jderose@lindabury.com](mailto:jderose@lindabury.com)

/s/  
\_\_\_\_\_  
LEONARD A. BENNETT, VSB#37523  
SUSAN M. ROTKIS, VSB#40693  
CONSUMER LITIGATION ASSOCIATES, P.C.  
Attorney for Plaintiff  
763 J. Clyde Morris Boulevard, Suite 1-A  
Newport News, Virginia 23601  
(757) 930-3660 - Telephone  
(757) 930-3662 – Facsimile  
Email: [lenbennett@clalegal.com](mailto:lenbennett@clalegal.com)